

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

JUDGE JOAN H. LEFKOW

y.

No. 07 CR 291
Violations: Title 18,
United States Code, Sections 371,
2113(a) and 924(c)

MAGISTRATE JUDGE NOLAN

COUNT ONE

The SPECIAL MARCH 2007 GRAND JURY charges:

1.a. At all times material to this indictment, Chase Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

b. Chase Bank maintained a retail branch at 850 South Wabash, Chicago, Illinois, ("the bank branch").

c. Defendant Caroline Rivera was employed as a customer service representative of the bank branch.

d. Individual A was a former employee of the bank branch.

3. Between the approximate dates of November 22, 2006 and November 27, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

NICKOLAS LEE and
CAROLINA RIVERA,

defendants herein, knowingly conspired and agreed with each other and with Individual A to commit an offense against the United States, bank robbery, in violation of Title 18, United States Code, Section 2113(a).

4. It was part of the conspiracy that on or about November 22, 2006, NICKOLAS LEE, CAROLINE RIVERA, and Individual A met to discuss the robbery of the bank branch, which meeting constituted an overt act in furtherance of the conspiracy. During that meeting CAROLINE RIVERA and Individual A gave Nickolas Lee confidential information about the operations of the bank branch.

5. It was further part of the conspiracy that on or about November 24, 2006, defendant NICKOLAS LEE entered the bank branch, while armed with a handgun and forced employees of the bank branch to open the vault and remove approximately \$109,100, that defendant LEE stole from the bank branch, which constituted an overt act in furtherance of the conspiracy.

6. It was further part of the conspiracy that on or about November 27, 2007, CAROLINA RIVERA denied to a manager employed by Chase Bank that she knew Lee or recognized his image in a bank surveillance photograph, which constituted an overt act in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 371

COUNT TWO

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about November 24, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

NICKOLAS LEE and
CAROLINE RIVERA,

defendants herein, by force and violence, and by intimidation, took from the presence of employees of Chase Bank, a financial institution the deposits of which were insured by the Federal Deposit Insurance Corporation, approximately \$109,100 belonging to, and in the custody and possession of, Chase Bank; and in committing such offense,

NICKOLAS LEE,

defendant herein, assaulted and put in jeopardy the lives of such employees by use of a dangerous weapon, a handgun;

In violation of Title 18, United States Code, Sections 2113(a) and (d).

COUNT THREE

The SPECIAL MARCH 2007 . GRAND JURY further charges:

On or about November 24, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

NICKOLAS LEE,

defendant herein, during and in relation to a crime of violence, for which he may be prosecuted in a court of the United States, to-wit: bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and (d), knowingly used and carried a firearm, and possessed such firearm in furtherance of the crime, and during the commission of the offense brandished such firearm;

In violation of Title 18, United States Code, Section 924(c)(ii).

COUNT FOUR

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about May 5, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

NICKOLAS LEE,

defendant herein, took from the presence of employees of Chase Bank, a financial institution the deposits of which were insured by the Federal Deposit Insurance Cooperation, approximately \$38,300, belonging to, and in the custody and possession of, Chase Bank, and in committing such offense,

NICKOLAS LEE,

defendant herein, assaulted and put in jeopardy the lines of such employees by use of a dangerous weapon, a handgun;

In violation of Title 18, United States Code, Sections 2113(a) and (d).

COUNT FIVE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On May 5, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

NICKOLAS LEE,

defendant herein, during and in relation to a crime of violence, for which may be prosecuted in a court of the United States to-wit: bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and (d), knowingly used and carried a firearm, and possessed such firearm in furtherance of the crime, and during the commission of the offense brandished such firearm;

In violation of Title 18, United States Code, Section 924(c)(ii).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY